

REMARKS

As a preliminary matter, Applicants thank the Examiner for discussing the above-identified case with Applicants' representatives. A Statement of Substance of Interview is enclosed herewith.

Claims 1, 3-6, and 8-11 are all the claims pending in the present application¹. In summary, the Examiner maintains the same previous claim rejections. Specifically, claims 1, 3-6, and 8-11 remain rejected under 35 U.S.C. § 112, second paragraph, as allegedly being indefinite. Claims 1, 6 and 11 remain rejected over Kempf (U.S. Patent Appln. Pub. No. 2003/0211842). Claims 3-5 and 8-10 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Kempf in view of new applied reference Chen (U.S. Patent No. 6,829,483).

§112, second paragraph, Rejections - Claims 1, 3-6 and 8-11

Applicants believe that the Examiner's rejection of claims 1, 3-6, and 8-11 under 35 U.S.C. § 112, second paragraph, are obviated.

§102(e) Rejection (Kempf) - Claims 1, 6 and 11

Claims 1, 6, and 11 are rejected based on reasons similar to those set forth in the previous Office Action and the Examiner adds more comments in the *Response to Arguments* section of the present Office Action.

With respect to independent claim 1, Applicants maintain the previous submitted arguments with respect to claim 1. That is, Applicants maintain that Kempf does not disclose or suggest at least, "wherein if the packet received from the first interface is a binding update packet encoded using the authentication key generated by the mobile node according to the

¹ Please note that claims 1, 4, 5, 6, 8 and 11 are amended, as indicated herein, for clarification purposes only. No further search and/or consideration should be required.

authentication key generation token, the packet monitoring unit outputs the binding update packet to the controller," (emphasis added) as recited in claim 1. The Examiner cites numbered paragraphs 18-21, 53 and 112 of Kempf as allegedly satisfying the above quoted feature of claim 1. Although Kempf does disclose that a mobile node uses addressed based keys to establish a security association, nowhere does Kempf disclose or suggest that a binding update packet is encoded using an authentication key generated by a mobile node. There is no discussion that the authentication key is generated by a mobile node in Kempf. Therefore, since this particular feature is not satisfied by Kempf, Applicants submit that Kempf does not anticipate claim 1.

Applicants submit that independent claims 6 and 11 are patentable at least based on reasons similar to those set forth above with respect to claim 1.

§103(a) Rejections (Kempf/ Chen) - Claims 3-5 and 8-10

Applicants submit that dependent claims 3-5 and 8-10 are patentable at least by virtue of their respective dependencies from independent claim 1 and 6, respectively.

Further, with respect to dependent claims 4 and 9, Applicants previously argued that the applied references, either alone or in combination, do not disclose or suggest at least, "wherein the controller controls the packet converter, so that the packet converter passes the packet without converting the source address included in the packet, only when the binding information does not exist in the data storage unit," as recited in claim 4 and similarly recited in claim 9. *See page 9 of Amendment dated October 17, 2007.* In response, the Examiner alleges:

This argument is not persuasive because this limitation is inherently present in Kempf because Kempf does not specify that the home agent changes the source address in the message header of messages received from mobile nodes, it meets the limitation of the controller controls the packet converter, so that the packet converter passes the packet without converting the source address included in the packet, if the binding information does not exist in

the data storage area since the home agent of Kempf never converts the source address.

In response, first, Applicants submit that the Examiner does not identify the particular portion of the references relied upon by the Examiner to support the assertion by the Examiner that Kempf never converts a source address. Further, even if, *arguendo*, Kempf does not teach ever converting the source address, Kempf still does not satisfy the features of claim 4, as claim 4 recites that a packet converter passes the packet without converting the source address included in the packet, only when the binding information does not exist in the data storage unit. If in Kempf, the source address is never converted, this does not satisfy the feature of passing a packet without converting the source address only when binding information does not exist in a data storage unit.

At least based on the foregoing, Applicants submit that claims 4 and 9 are patentably distinguishable over the applied references.

Further, Applicants submit that an exemplary result of the claimed invention is that procedures needed to process IPv6 packets can be executed by the router, not by the correspondent nodes. That is, the router of the claimed invention can enable the correspondent nodes to communicate with a mobile IPv6 node in case the correspondent nodes cannot support mobile IPv6 by performing the mobile IPv6 functions on behalf of the correspondent nodes.

However, the applied references do not disclose or suggest that the router performs IPv6 functions since the references do not even consider the situation where the correspondent nodes are not able to perform mobile IPv6 functions.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the

Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

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